

# **Exhibit J**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

PFLAG, INC.; *et al.*,

*Plaintiffs,*

v.

DONALD J. TRUMP, in his official capacity  
as President of the United States; *et al.*,

*Defendants.*

Civil Action No.

**DECLARATION OF LAWRENCE LOE**

I, Lawrence Loe,<sup>1</sup> pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is Lawrence Loe. I am a Plaintiff in this action. I offer this Declaration in support of Plaintiffs' Motion for a Preliminary Injunction. I am over 18 years old, have personal knowledge of the facts set forth in this Declaration, and would testify competently to those facts if called as a witness.

2. I am 18 years old and a high school student in New York City, where I live with my father.

3. I am a member of PFLAG.

4. I am transgender. I was assigned a female sex at birth.

5. I started puberty when I was 10 years old, in 2017. When puberty started, I knew it was incredibly wrong for me. It was completely awful going through female puberty. My body started to feel wrong. School was miserable for me, because puberty was making me miserable. I

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<sup>1</sup> Lawrence Loe is a pseudonym. I am proceeding under a pseudonym to protect my right to privacy and myself from discrimination, harassment, and violence, as well as retaliation for seeking to protect my rights.

was completely depressed, but I didn't fully understand why I was so unable to function. I started to explore these very strong feelings that something was not right on my own. It took me two years, until I was 12, in 2019, to understand why puberty felt so wrong for me. Eventually, I realized that female puberty felt so wrong because I was not a girl and that I was transgender.

6. I started sixth grade in the fall of 2018, when I was still 11. I was struggling in school and couldn't make friends. In seventh grade, in 2019, when I was 12, I told my dad that I was transgender. By November of 2019, we decided that I was doing so poorly in school that I actually needed to switch to a new middle school. When I switched to that new school, I did not want to be seen as a girl, so I cut my hair short and picked a gender-neutral version of my birth name to go by. I was still completely depressed and not sure why.

7. When I came out to my dad as transgender, I also asked if we could go to a doctor because I was so miserable about puberty, especially getting my period. My parents were separated, but all three of us went to the doctor together.

8. We had a doctor's appointment in January 2020, just after I turned 13. I filled out a bunch of evaluations and paperwork and explained how puberty was making me feel. The doctor confirmed that what I was feeling was likely gender dysphoria. I learned that there was medication I could take, called puberty blockers, that would stop my body from developing more female characteristics. The doctor explained how those would work, and I said that is what I wanted. It seemed like the doctor agreed with me, as did my father. At some point, I was asked to leave the room, and my parents spoke alone with the doctor for over two hours. My mother would not consent to puberty blockers. But because I was experiencing such severe distress and depression about my period, the doctor suggested that I take a medication that would just suppress my periods, but not otherwise block puberty.

9. In February 2020, I started to see a therapist who works with LGBTQ people and also treats transgender people. I still see that therapist every week. I talked a lot about how depressed I was because I was going through puberty and was not allowed to take medication to stop it. It felt like that terrible feeling would never end. Going to therapy helped me manage some of my mental health, but it did not fix that terrible feeling of dysphoria.

10. Not being able to receive puberty blockers was horrific. Even though I knew that there was a medication that existed that would stop these fundamentally wrong changes from happening to me, I could not receive it. The little bit of puberty I had experienced already was awful, and I knew things were only going to get worse. I hated everything that had happened to my body so far, and just had to live and watch while more of it happened. I was on this terrible trajectory and couldn't get off.

11. Things got worse. Because I was not on puberty blockers, my breasts continued to grow. I started refusing to eat in hopes that by starving myself, my chest would get smaller. I developed an eating disorder. My mental health was the lowest it has ever been. I was self-harming, and I felt hopeless. I realized that if I didn't get help, I wouldn't survive. I asked my parents for more help and started seeing my therapist twice a week. I still had severe dysphoria. But I was determined to turn my life around so I could survive long enough to live in a body that was mine. I adopted a very strict daily routine around meditating, eating, and running, which helped me at least survive. But even though I tried my hardest to be happy, I still had terrible gender dysphoria.

12. In July 2021, after I had turned 14, I started to see a new doctor. I was still only on medication to suppress my period, but nothing else. We met every few months to see how I was doing. I continued to tell her that I had dysphoria around my body, even though I was on a

menstrual suppressant, and she also diagnosed me with gender dysphoria. I continued to see that doctor until July 2023, after I had turned 16.

13. In the fall of 2021, I started ninth grade. High school was really rough. I still looked and sounded like a girl, and so I was misgendered all the time. I tried to change the way I dressed so that people would perceive me as a guy, but I was still harassed. I wore a COVID mask longer than other students in part because it helped stop me from being misgendered. Getting misgendered is painful because I am not being seen for who I am, and it reminds me of everything physical about my body that makes me dysphoric, and I have the terrible realization that other people can see that about my body, too, and are pointing it out.

14. In 2022, when I was a sophomore in high school, I legally changed the name on my birth certificate and my gender marker, and my IDs.

15. In the summer of 2023, when I was 16, my parents and I met with a family therapist. My gender dysphoria had not gotten better, even with weekly or twice weekly therapy for over three years. Part of our discussion was helping my parents come to a mutual decision about whether I could consider medication to treat my gender dysphoria, aside from the menstrual suppressant.

16. After both my parents consented, I started with a new doctor that summer to discuss the potential for testosterone. We went over all of the informed consent paperwork with the potential risks and benefits. I already knew the alternative, which was not taking testosterone, and I still had gender dysphoria. A lot of the “side” effects for testosterone were actually just effects that I wanted: a deeper voice, facial and body hair, and changes to my face and body shape. I had also done my own research about what testosterone’s effects were on trans guys, including learning about the physical changes that happened. Learning more about trans guys’ experiences, I realized that I saw myself in their stories, and that was what I wanted for myself. At that point, I had been

researching and thinking about testosterone for years. My mother was worried, though, that I would become a detransitioner. I wanted to take her concerns seriously, so I watched videos and listened to the experiences of people who had detransitioned. Their reasons for transitioning in the first place seemed very different than my reasons for wanting to transition.

17. I also discussed fertility, both with my parents and the doctor. As an ethical matter, I do not want to have biological children of my own. As a mental health matter, the idea of being pregnant makes me so dysphoric that I do not think I could endure diving birth to biological children. If I did want children as part of my family, I would adopt. As a medical matter, my own research and the doctor's explanations confirmed that testosterone would be unlikely to cause infertility because I had already gone through female puberty, especially if I stopped testosterone at some point.

18. I finally started taking testosterone at 16, with my assent and both my parents' consent. After four years of being completely miserable in my body, I was finally happy. The rest of my family noticed that, even before the physical effects of testosterone started, I was already visibly happier. I finally knew that I was on the right track, and I was so excited to be on the right trajectory. I had felt like a freak in my own body, and testosterone made me feel like I could exist in my own skin and be comfortable.

19. There is a whole list of things that I couldn't do before starting testosterone that I could do after. I hated talking, because I couldn't stand my own voice. With testosterone, I started speaking up in class. I sang a lot as a kid, but I quit because of voice dysphoria. Once my voice started to deepen, I could sing again. I could dress and groom more like myself, which is a little bit emo, without worrying about being seen as a girl. I felt like I could finally go to the gym and enjoy being in my body.

20. I have been taking testosterone for almost two years now. I do not regret starting and continuing to take testosterone. It was definitely the right decision.

21. I still continue to have a lot of dysphoria around my chest, because I had grown breasts. I cannot leave my room without wearing a binder or very tight undershirt, which makes it hard to breathe and move, or without adhesive tape, which hurts my skin.

22. I went to schedule my first consult with a surgeon for chest masculinization surgery in February 2024, after I turned 17, but the soonest appointment was in June 2024. My longstanding existing providers evaluated me and provided me with letters of support. The letter from my therapist was also co-signed by a different mental health professional, and I got a separate medical letter of support from the doctor who prescribes my testosterone. I was not allowed to schedule my surgery until after I already had both letters. After my June 2024 appointment, I scheduled my surgery for after I turned 18, when as a legal adult, I could consent for myself.

23. After that long process of waiting, I finally got a surgery date for the first week in February 2025 at NYU Langone. I have been looking forward to obtaining chest masculinization surgery for six years. I made arrangements and underwent pre-operative blood testing. My grandmother, who lives on a fixed income, booked a flight to come and help take care of me through mid-March. I have organized all of 2025 around being able to get this surgery. I spent a lot of money purchasing recovery supplies. I made summer plans based on thinking I would have recovered already.

24. I have been counting down the days to my surgery. Just knowing that I had my surgery scheduled has made it easier to manage my gender dysphoria. Trying to flatten my chest is physically painful and hard on my skin. But I thought that by this summer, I'd be able to live my life normally. I have a whole list of things that I cannot do now, but that I will be able to do

after I have top surgery. I will be able to run and go swimming without a shirt. I want to learn to skateboard. I will be able to wear white t-shirts with nothing on underneath. I'll be able to sit up straight, and hug people. I'll be able to sleep without a shirt or a binder on, and my pets will be able to lay on my chest. I am also looking forward to having my first relationship, but I don't want that to happen until I feel at home in my body.

25. On January 28, 2025, the White House issued an Executive Order entitled "Protecting Children from Chemical and Surgical Mutilation" ("Executive Order"). I had a panic attack that my surgery would be cancelled, but everyone told me that I shouldn't worry because nothing could change in the next week.

26. On January 29, 2025, I received a call from the Nurse Practitioner at NYU Langone with whom I had been working informing me that they have had to cancel my surgery the following week due to the Executive Order.

27. I have tried not to wallow, but I am devastated at the thought that this medical care that I have been looking forward to and working toward for so long and that is the very thing that is keeping me healthy and hopeful could be taken away. I have reached out to other hospitals about surgery dates, but given how long it took me at NYU Langone, I'm not hopeful. I also do not want to have to go to a surgeon who I am less comfortable with. I have been researching options out of the country, but I don't know that I can afford that, and I would feel safer recovering at home.

28. My whole life is on hold while I wait to get top surgery. I spent so much of my teenage years being miserable in my body, but holding out hope that, as an adult, I could get the medical care that I needed to treat my gender dysphoria and feel like myself. Now, I can't.



I declare under penalty of perjury that the foregoing is true to the best of my knowledge and belief.

Dated this \_\_ day of February, 2025

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Lawrence Loe

I declare under penalty of perjury that the foregoing is true to the best of my knowledge and belief.

Dated this 10 day of February, 2025

Lawrence Loe  
Lawrence Loe